

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF PENNSYLVANIA

CASE NO. 2:15-cv-03067-SD

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BENJAMIN ABELLA, INDIVIDUALLY AND ON  
BEHALF OF ALL OTHERS SIMILARLY  
SITUATED,

Plaintiff,

v.

STUDENT AID CENTER, INC.; MOZEO, LLC

Defendants.

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**ORDER GRANTING DEFENDANT STUDENT AID CENTER, INC.'S**  
**MOTION FOR ENLARGEMENT OF TIME**  
**TO RESPOND TO PLAINTIFF'S COMPLAINT**

AND NOW this \_\_\_\_\_ day of \_\_\_\_\_, 2015, upon consideration of Defendant  
STUDENT AID CENTER, INC.'s Motion for Enlargement of Time to Respond to  
Plaintiff's Class Action Complaint and Demand for Jury Trial ("Complaint") and all  
other necessary documents, it is hereby ORDERED AND DECREED that:

1. STUDENT AID CENTER's Motion for Enlargement of Time to Respond  
to Plaintiff's Complaint is GRANTED.
2. STUDENT AID CENTER has up to and including August 3, 2015 to  
respond to Plaintiff's Complaint.

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HONORABLE STEWART DALZELL  
U.S. DISTRICT COURT JUDGE

cc: counsel of record

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**DEFENDANT STUDENT AID CENTER, INC.'S MOTION FOR  
ENLARGEMENT OF TIME TO RESPOND TO PLAINTIFF'S PLEADINGS**

Defendant STUDENT AID CENTER, INC. ("STUDENT AID"), pursuant to Federal Rule of Civil Procedure 6(b), respectfully moves this Court for an enlargement of time, up to and including August 3, 2015, to respond to Plaintiff's BENJAMIN ABELLA, INDIVIDUALLY AND ON BEHALF OF ALL OTHERS SIMILARLY SITUATED Class Action Complaint and Demand for Jury Trial ("Complaint") and all other pleadings, and as grounds states:

1. Plaintiff filed the instant action on or about June 1, 2015. [D.E. 1]  
STUDENT AID was served with Plaintiff's Complaint on June 11, 2015. STUDENT AID's response to the Complaint is currently due on July 2, 2015.
2. Florida counsel for STUDENT AID was retained on June 30, 2015 by STUDENT AID to represent its interests in this matter. Florida counsel for STUDENT AID is in the process of applying for *Pro Hac Vice* admission to this Court. The undersigned counsel will be serving as Associate Counsel for STUDENT AID's Florida counsel pursuant to local rule 83.5.2. Due to Florida counsel's recent retention as well as


the process of being admitted *Pro Hac Vice*, counsel for STUDENT AID requires additional time to formulate a response to the Complaint. Specifically, STUDENT AID requests an enlargement of time, up to and including August 3, 2015, to respond.

3. Florida counsel for STUDENT AID has attempted to communicate with counsel for Plaintiff, David S. Senoff, Esq., by email and by telephone on June 30 and July 2, 2015, however, Florida counsel has not received a response from Plaintiff's counsel.

4. STUDENT AID's request is made in good faith and not meant to cause undue delay. Further, Plaintiff will not be unduly prejudiced as a result of the requested enlargement of time.

WHEREFORE, STUDENT AID respectfully requests this Court enter an Order granting STUDENT AID an enlargement of time, up to and including August 3, 2015, to respond to Plaintiff's Complaint and all other pleadings, and for such other relief as this Court deems appropriate in favor of STUDENT AID.

Respectfully submitted,

By:   
\_\_\_\_\_  
Patrick T. Henigan, Esquire  
Attorney for Defendant  
344 West Front Street  
Media, PA 19063  
Telephone No.: (610) 565-3700

Dated: July 2, 2015

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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served by  
cm/ecf on July 2, 2015, on all counsel of record on:

David S. Senoff, Esq.  
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*Counsel for Plaintiff*

By: 

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